

1 Michele R. Stafford, Esq. (SBN 172509)
2 Blake E. Williams, Esq. (SBN 233158)
3 SALTZMAN & JOHNSON LAW CORPORATION
4 44 Montgomery Street, Suite 2110
5 San Francisco, CA 94104
6 (415) 882-7900
7 (415) 882-9287 – Facsimile
8 mstafford@sjlawcorp.com
9 bwilliams@sjlawcorp.com

10 Attorneys for Plaintiffs

11 Robert E. Carey, Jr., Esq. (State Bar No. 47556)
12 CAREY & CAREY, A LAW CORPORATION
13 Post Office Box 1040
14 Palo Alto, CA 94302
15 (650) 328-5510
16 (650) 853-3632 – Facsimile
17 rec@careyandcareylaw.com

18 Attorneys for Defendant Fremont Paving Company, Inc.

19 UNITED STATES DISTRICT COURT

20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21 F.G. CROSTHWAITE, et al.

22 Case No.: C11-4417-JSW

23 Plaintiffs,

24 v.
25 **JOINT CASE MANAGEMENT
CONFERENCE STATEMENT and
REQUEST TO CONTINUE CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**

26 FREMONT PAVING COMPANY, INC., a
27 California Corporation, et al.,

28 Defendants.

Date: August 3, 2012

Time: 1:30 p.m.

Ctrm: 11, 19th Floor

Judge: Honorable Jeffrey S. White

29 Defendant Fremont Paving Company, Inc. hereby joins in Plaintiffs' previously filed
30 Request to Continue Case Management Statement. The parties jointly request that the Case
31 Management Conference, currently on calendar for August 3, 2012, be continued to allow
32 Plaintiffs to file their Motions for Summary Judgment and Default Judgment respectfully.

33 1. Plaintiffs have made several offers to resolve this matter by payment plan.
34 Defendants are unable to commit to any resolution at the current time. Defendants are aware that
35 Plaintiffs must move this matter forward by filing dispositive Motions.

36 2. There are no issues that need to be addressed at the currently scheduled Case

1 Management Conference. In the interest of conserving costs as well as the Court's time and
2 resources, Plaintiffs respectfully request that the Case Management Conference, currently
3 scheduled be continued for 60 days.

4 Dated: July 31, 2012

SALTZMAN & JOHNSON
LAW CORPORATION

5

6

By: _____ /S/
7 Michele R. Stafford
Attorneys for Plaintiffs

8

Dated: July 31, 2012

CAREY & CAREY, A LAW
9 CORPORATION

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

By: _____ /S/
Robert E. Carey, Jr.
Attorneys for Defendant Fremont Paving
Company, Inc.

IT IS SO ORDERED.

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to October 5, 2012 at 1:30 p.m. All related deadlines are extended accordingly.

Date: August 1, 2012


THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT JUDGE